

Message

From: Gordon, Michael [Gordon.Mike@epa.gov]
Sent: 6/8/2021 5:29:41 PM
To: Opila, MaryCate [Opila.MaryCate@epa.gov]; Burger, Riley [burger.riley@epa.gov]
Subject: RE: PSD Question

Hi Riley and MC,

Sorry I didn't get back right away, but I agree with MC.

Mike Gordon
Chief, Planning and Implementation Branch
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Gordon.Mike@epa.gov

From: Opila, MaryCate <Opila.MaryCate@epa.gov>
Sent: Monday, June 07, 2021 10:11 AM
To: Burger, Riley <burger.riley@epa.gov>; Gordon, Michael <Gordon.Mike@epa.gov>
Subject: RE: PSD Question

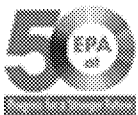
Thanks, Mike.

Riley- I think it is fair to say that BACT needs to apply at all times, including during start-up/shutdown. So they don't need the same limit, but they should do a SU/SD BACT analysis:

Ex. 5 Deliberative Process (DP)

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Mary Cate Opila, P.E., Ph.D.
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From: Burger, Riley <burger.riley@epa.gov>
Sent: Friday, June 04, 2021 1:54 PM
To: Gordon, Michael <Gordon.Mike@epa.gov>; Opila, MaryCate <Opila.MaryCate@epa.gov>
Subject: RE: PSD Question

Hi Mike,

Thanks for your input on this! I took a look again at the 2015 SSM SIP Call and 2020 Guidance and would like to make sure I have a handle on the issue conceptually. My understanding is these documents center on whether SIPs can allow exemptions during SSM for excess emissions. In the 2015 SIP call Pennsylvania was not a named state which would imply its SIP does not contain the exemption provisions in question. But it is unclear to me where to find the SSM provisions in ACHD (PA's) SIP that prohibit excess SSM emissions and/or require limits at all times. Is this a listed requirement somewhere?

Also I'm still trying to work out how BACT and LAER limits fit into the picture. ACHD has a SIP-approved NANSR and PSD programs so does that mean these are "SIP" limits? If not, it seems this SSM SIP guidance would not have a bearing on SSM requirements in establishing BACT/LAER. Am I situating this correctly? Do you have any additional thoughts?

Riley Burger

Physical Scientist
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From: Gordon, Michael <Gordon.Mike@epa.gov>
Sent: Thursday, June 03, 2021 4:10 PM
To: Opila, MaryCate <Opila.MaryCate@epa.gov>
Cc: Burger, Riley <burger.riley@epa.gov>
Subject: RE: PSD Question

Hi MC,

A while ago we came out with a guidance document that says SSM provisions MAY be permissible under certain circumstances...that would be our most recent take, but that was from Oct 2020, so needless to say a lot has changed since then. Still no indication how we are going to move forward with SIPs. I think the last I remember BACT should address SSM, whether or not they are the same/different limits as normal operation, but anything SSM related is subject to change. Clear as mud!

https://www.epa.gov/sites/production/files/2020-10/documents/placeholder_0.pdf

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From: Opila, MaryCate <Opila.MaryCate@epa.gov>
Sent: Thursday, June 03, 2021 3:42 PM
To: Gordon, Michael <Gordon.Mike@epa.gov>
Cc: Burger, Riley <burger.riley@epa.gov>
Subject: PSD Question

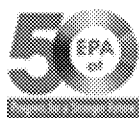
Hi Mike,

Ex. 5 Deliberative Process (DP)

If you don't know, you don't have to dig too deep.

Thanks,
mc

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From: Burger, Riley <burger.riley@epa.gov>
Sent: Thursday, June 03, 2021 3:17 PM
To: Opila, MaryCate <Opila.MaryCate@epa.gov>
Subject: RE: INVENERGY NSR Comments

Hi Mary Cate,

I've taken a stab at addressing the additional areas for comment we discussed yesterday. As a reminder the comment period closes next Tuesday, June 8.

Comments attached and original here:

Ex. 6 Personal Privacy (PP)

Additional info below:

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- ## Ex. 5 Deliberative Process (DP)
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Ex. 5 Deliberative Process (DP)

Riley Burger

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From: Burger, Riley

Sent: Wednesday, May 26, 2021 3:42 PM

To: Opila, MaryCate (Opila.MaryCate@epa.gov) <Opila.MaryCate@epa.gov>

Subject: INVENERGY NSR Comments

Hi MC,

I'm drafting comments on ACHD's INVENERGY major NSR and wanted to get a time on your calendar to discuss. Can you extend the Wednesday 6/2 check-in to an hour or propose another time in advance of 6/8 (end of comment period)? There will be modeling comments from Tim to include as well.

Riley Burger

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